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Attorneys for Defendant United Airlines, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY, NEWARK DIVISION**

WILLIAM ARCE,

Plaintiff,

vs.

TRAVEL GUARD GROUP, INC.,
NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PA., AND UNITED
AIRLINES, INC.

Defendants.

Case No.: 21-cv-11741 (JMV)(MF)

**NOTICE OF MOTION TO
DISMISS PLAINTIFF’S CLASS
ACTION COMPLAINT**

PLEASE TAKE NOTICE that on August 16, 2021, at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendant United Airlines, Inc. (“United”) will

move before the Honorable John Michael Vazquez in Courtroom PO-03 of the Lautenberg U.S. Post Office & Courthouse, Federal Square, Newark, New Jersey 07101, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) dismissing Plaintiff's Class Action Complaint in its entirety with prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, United shall rely on the accompanying Memorandum of Law in Support of Motion to Dismiss Plaintiff's Class Action Complaint, and the Certification of Counsel in Support. A proposed Order also accompanies this Motion.

PLEASE TAKE FURTHER NOTICE that United hereby requests oral argument.

Dated: July 20, 2021

WINNE, BANTA, BASRALIAN & KAHN, P.C.,
Attorneys for Defendant United Airlines, Inc.

s/ Michael J. Cohen

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CERTIFICATE OF SERVICE

I, Michael Cohen, certify that on July 20, 2021, I filed a copy of the foregoing Notice of Motion to Dismiss, and the accompanying Memorandum of Law, Certification, and Proposed Order, electronically using the Court's CM/ECF system, which will automatically generate notice of this filing to all Counsel of Record.

s/ Michael J. Cohen

Michael J. Cohen